

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	Crim. No. 05-cr-10226-RWZ
)	
SAMNANG AM,)	
Defendant.)	

JOINT MOTION TO EXCLUDE TIME UNDER SPEEDY TRIAL ACT

The United States of America (the “government”) and the defendant, Samnang Am (“Am”), respectfully move this Honorable Court to exclude under the Speedy Trial Act the time from July 24, 2006, to and including the date upon which the Court’s written decision on Am’s Motion to Suppress Evidence and Statements is entered on the above captioned docket.

In support of this motion, the parties jointly state as follows:

1. On July 24, 2006, Am filed a Motion to Suppress Evidence and Statements in the above captioned matter.
2. This Honorable Court conducted a two-day evidentiary hearing on Am’s Motion to Suppress Evidence and Statements on October 31, 2006 and November 7, 2006. At the conclusion of the hearing, the Court took the matter under advisement.
3. The parties agree that the time from July 24, 2006, to and including the date upon which the Court’s written decision on Am’s motion is docketed in the above referenced matter should be excluded under the Speedy Trial Act. The parties agree that this motion serves the ends of justice and outweighs the interests of the public and the defendant in a speedy trial, and that the requested exclusion is warranted under 18 U.S.C. § 3161(h)(1) and (8).
4. Apart from the foregoing agreement of the parties, both parties believe that the

requested excluded time period is excludable under the Speedy Trial Act statute on its own. See 18 U.S.C. § 3161(h)(1) and (8).

WHEREFORE, the parties jointly request this Honorable Court to exclude under the Speedy Trial Act the time from July 24, 2006, to and including the date upon which the Court's written decision on Am's Motion to Suppress Evidence and Statements is entered on the above captioned docket.

Dated: February 8, 2007

Respectfully submitted,

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By his attorney,

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